

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE COMMISSION,)	Case No. 1:18-cv-08175-ER
)	
)	
Plaintiff,)	DECLARATION OF RANDALL R.
)	LEE IN SUPPORT OF
v.)	MOTION OF COOLEY LLP AND
)	RANDALL LEE FOR
BARRY C. HONIG,)	LEAVE TO WITHDRAW AS
<i>et al.</i> ,)	COUNSEL FOR DEFENDANT
)	ROBERT LADD
Defendants.)	

I, Randall R. Lee, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am an attorney duly licensed to practice law in the State of California, and I am admitted *pro hac vice* to this Court for the above-captioned matter. I am a partner with the law firm Cooley LLP (“Cooley”), counsel for Defendant Robert Ladd in the above-captioned matter.
2. I respectfully submit this declaration in support of Cooley and Randall Lee’s Motion for Leave to Withdraw as counsel to Mr. Ladd. I have personal knowledge of the facts below and, if called as a witness, I could and would testify competently thereto.
3. The Securities and Exchange Commission (“SEC”) commenced this action by filing a Complaint against Mr. Ladd, among numerous other defendants, for various violations of the securities laws.
4. On September 20, 2018, I moved the Court to appear *pro hac vice* as co-counsel for Mr. Ladd, along with Christopher Johnstone of the law firm Wilmer Cutler Pickering Hale and Dorr LLP. The Court granted the motions on September 21, 2018.

5. The SEC filed a First Amended Complaint (“FAC”) in this action on March 8, 2019. Mr. Ladd moved to dismiss the FAC on June 19, 2019. The Court granted the motion in part and denied it in part.

6. The SEC filed a Second Amended Complaint (“SAC”) against Mr. Ladd on March 16, 2020. Mr. Ladd moved to dismiss the SAC on April 30, 2020.

7. On or about May 13, 2020, Mr. Ladd informed Cooley that another counsel, Adam Ford of Ford O’Brien, LLP, would be taking over representation of Mr. Ladd in this action, and asked Cooley to discontinue further work as its legal representatives with respect to said action. On May 18, 2020, Adam Ford entered his appearance as co-counsel on behalf of Mr. Ladd.

8. Cooley and Lee are not asserting a retaining or charging lien against Mr. Ladd.

9. Discovery remains ongoing in this action. Fact discovery is currently scheduled to end on July 21, 2020. Expert discovery is currently scheduled to end on October 6, 2020. The parties are scheduled to participate in a status conference with the Court on October 21, 2020.

Dated May 21, 2020

/s/ Randall R. Lee
Randall R. Lee